

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JOHN HOGAN,

:

Plaintiff,

:

07 Civ. 8563 (VM)

- against -

:

JPMORGAN CHASE & CO.,

:

**DEFENDANT'S RULE 26  
DISCLOSURE STATEMENT**

Defendant.

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Defendant JPMorgan Chase & Co. ("JPMorgan Chase"), by its attorney, JPMorgan Chase Legal and Compliance Department, Frederic L. Lieberman, Assistant General Counsel, as and for its disclosure pursuant to Fed. R. Civ. P. 26, asserts as follows:

A. The name and, if known, the address and telephone number of each individual other than Plaintiff likely to have discoverable information that the disclosing party may use to support its claims or defenses:

Name

Address

Randall Berini

c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815

Maritza Diez

c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815

Debra Crabtree

c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815

Dorothy Valenti

c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815

Randall Berini is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during some or all of the relevant time period, the employment, performance and job responsibilities of other persons under his management and supervision during some or all of the relevant time period, of various events referred to in Plaintiff's Complaint and Defendant's Answer and Counter-Claims, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Maritza Diez is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during some or all of the relevant time period, the employment, performance and job responsibilities of other persons under Randall Berini's management and supervision during some or all of the relevant time period, of various events referred to in Plaintiff's Complaint and Defendant's Answer and Counter-Claims, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Debra Crabtree is likely to have knowledge concerning the Executive MBA Education Loan Agreement between Plaintiff and Defendant, of various events referred to in Plaintiff's Complaint and Defendant's Answer and Counter-Claims, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Dorothy Valenti is likely to have knowledge concerning the Executive MBA Education Loan Agreement between Plaintiff and Defendant, of various events referred to in Plaintiff's Complaint and Defendant's Answer and Counter-Claims, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

B. Documents, data compilations, and tangible things that the disclosing party may use to support its claims and defenses:

- Plaintiff's employee records file, if any;
- Plaintiff's AccessHR file, if any;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Human Resources Department concerning Plaintiff;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Commercial Banking Middle Market department concerning Plaintiff;
- Relevant documents and/or files, if any, maintained by any individual JPMorgan Chase manager or supervisor regarding Plaintiff;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Employee Relations Department concerning Plaintiff;
- Relevant documents and/or files, if any, concerning the Executive MBA Education Loan Agreement between Plaintiff and Defendant;

- Relevant JPMorgan Chase policies, plans, and programs; and
- Relevant documentary communications, if any, whether in letter, memorandum, email, or other format.

C. The provisions of Fed. R. Civ. P. 26(a)(1)(C) are not applicable because Defendant is not seeking damages at this time from Plaintiff.

D. Defendant is investigating what, if any, insurance agreements may apply to Plaintiff's claims and will supplement its response as appropriate.

**RESERVATION OF RIGHTS**

Defendant reserves its right to supplement and/or amend its Rule 26 Disclosure Statement if and when it deems it appropriate.

Dated: January 8, 2008

**JPMORGAN CHASE LEGAL AND  
COMPLIANCE DEPARTMENT**

By: 

Frederic L. Lieberman, Esq.

Attorneys for Defendant and Counter-Claim

Plaintiff JPMorgan Chase & Co.

One Chase Manhattan Plaza, 26<sup>th</sup> Floor

New York, New York 10081

(212) 552-1815

frederic.l.lieberman@jpmchase.com

To: Harry Weinberg, Esq.  
Law Offices Of Harry Weinberg  
11 Beach Street  
New York, New York 10013  
(212) 989-2908

Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JOHN HOGAN,

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Plaintiff,

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**CERTIFICATE OF SERVICE**

JPMORGAN CHASE & CO.,

:

Defendant.

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I hereby certify that on January 8, 2008 I caused a copy of the following documents:

**DEFENDANT'S RULE 26 DISCLOSURE STATEMENT,  
DEFENDANT'S FIRST SET OF INTERROGATORIES TO PLAINTIFF,  
DEFENDANT'S FIRST REQUEST TO PLAINTIFF  
FOR PRODUCTION OF DOCUMENTS  
and  
NOTICE OF DEPOSITION**

to be served by first class mail directed to the attorney of plaintiff at the following address:

Law Offices of Harry Weinberg  
Harry Weinberg, Esq.  
11 Beach Street  
New York, New York 10013

Dated: New York, New York  
January 8, 2008

  
Frederic L. Lieberman